

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	<b>WT Docket No. 01-309</b>
Section 68.4(a) of the Commission's Rules	)	
governing Hearing Aid-Compatible Telephones	)	DA 04-567

To: The Commission

**COMMENTS ON PETITIONS FOR RECONSIDERATION**

- This filing is being made in response to the FCC's public notice, DA 04-567, inviting comments on petitions for reconsideration of the Report and Order, FCC 03-168, released August 14, 2003, adopting rules for compatibility between hearing aids and wireless telephone handsets.
- As a hearing aid manufacturer, we strenuously object to any efforts to change FCC's decision regarding the utilization of the ANSI C63.19 standard to measure digital wireless phone compatibility with hearing aids.
- We currently utilize the ANSI C63.19 standard, and it has proven to be a reliable and practical testing method. (Provide any details regarding tests you have performed.)
- The ANSI C63.19 test is an approved ANSI standard that we [believe is][have found to be] repeatable, predictable and accurate.
- The review and approval process to establish an ANSI standard is rigorous, and we have seen nothing to indicate that the ANSI C63.19 test method is inappropriate for measuring hearing aid and wireless phone compatibility.
- We are already working to ensure that our hearing aids achieve at least a U2 rating under the ANSI C63.19 test that predicts compatibility with the U3-rated handsets that telephone manufacturers are required by the new rules to produce.
- We are confident that we can provide hearing aids to consumers that will achieve a U2 rating, and that users will be able to select one of our products and a cellular phone with confidence that they will not face problems related to interference or will be able to resolve such problems if they occur.

Respectfully submitted,

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Chet Gopani  
Director of Quality Assurance

3/29/04

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